

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	Docket No.: 15_CR_536 (PGG)
-v-	:	
	:	DECLARATION OF
KALEIL ISAZA TUZMAN,	:	ERIC M. CREIZMAN
OMAR AMANAT, and	:	
IRFAN AMANAT	:	
	:	
Defendants.	:	
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I, ERIC M. CREIZMAN, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly admitted to practice law in the State of New York and before this Court. I am a member of the law firm of Creizman PLLC and represent Omar Amanat in the above-captioned case. I submit this declaration in support of Mr. Amanat's Omnibus Pretrial Motions.
2. Annexed hereto as Exhibit A is a true and correct copy of a letter dated September 19, 2016 from me to Assistant United States Attorneys Andrea Griswold and Damian Williams requesting a bill of particulars with respect to Superseding Indictment S-7.
3. During a meeting I had with Assistant United States Attorneys Andrea Griswold and Damian Williams, they expressed that they did not believe a bill of particulars was warranted and declined to provide responses to my September 19, 2016 letter.
4. Annexed hereto as Exhibit B is a true and correct copy of a letter dated March 15, 2017 from Caroline Polisi, Esq., of Creizman PLLC
5. On March 28, 2017, Ms. Polisi and I had a conference call with Assistant United States Attorney Damian Williams, during which he provided information responsive to

our bill of particulars requests on a preliminary, non-binding basis, reserving the right to supplement any information provided.

6. Specifically, Mr. Williams disclosed the government's position stating: (i) the identity of the U.S. Enable Trading Account; (ii) the nature of the "false and misleading representations" referenced in Paragraph 15 of the Indictment; (iii) that the solicitation of the investments in Enable through "false and misleading representations" to Maiden was an object of the alleged Maiden Capital Fraud conspiracy; (iv) the identities of the co-conspirators of the Maiden Capital Fraud conspiracy now known to the government ; (v) that the identity of the victims and intended victims of the wire fraud conspiracy were Maiden Capital investors; (vi) the nature of the "material misrepresentations" and "material facts" omitted concerning the Maiden Capital Fraud; (viii) the identities of the co-conspirators in the Market Manipulation Scheme now known to the government; and (ix) that Omar Amanat was not a co-conspirator in Count Five of the Indictment.

7. Annexed hereto as Exhibit C is a true and correct copy of the transcript of Omar Amanat's bail hearing before the Honorable Frank Maas held on July 13, 2016.

not been to China for over three years. Any bank accounts that Greenberg controlled in China were established to operate his business there, and they have long since been depleted, which the government well knows, but did not disclose to the district court.

New York, New York
March 31, 2017

/s/ Eric M. Creizman
Eric M. Creizman